LERMAN SENTER PLLC

WASHINGTON, DC

DAVID D. RINES
202.416.6751
DRINES@LERMANSENTER.COM

September 6, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Improving The Wireless Resiliency Cooperative Framework, PS Docket No. 11-60; Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On September 4, 2019, Michael Rosenthal and Kasey Chow of Southern Communications Services, Inc. d/b/a Southern Linc, Allen Bell of Georgia Power Company, Coy Trosclair of Southern Company Services, Inc., and J. Wells Ellenberg of Southern Company (collectively, "Southern"), together with the undersigned, met with Beau Finley, Michael Connelly, Jeffery Goldthorp (by phone), Nicole McGinnis (by phone), and Renee Roland (by phone) of the Public Safety and Homeland Security Bureau regarding the Commission's inquiry into improving wireless network resiliency.[1] During this meeting, Southern emphasized that disaster preparation and response coordination requires cooperation and partnership among all stakeholders, including communications companies, power companies, and state and local government officials and agencies.

Southern explained that the coordination process should begin well in advance, before any specific storm or other event has even been identified. In particular, all parties should be involved in storm preparation that takes place prior to the storm season, such as the drills held by the Georgia Emergency Management Agency ("GEMA"). Georgia Power regularly participates

[1] / *See, e.g.*, *Public Safety and Homeland Security Bureau Seeks Comment on Improving the Wireless Resiliency Cooperative Framework*, PS Docket No. 11-60, Public Notice, 34 FCC Rcd 2047 (2019); *Public Safety and Homeland Security Bureau Seeks Comment on Improving Wireless Network Resiliency Through Encouraging Coordination with Power Companies*, PS Docket No. 11-60, Public Notice, 34 FCC Rcd 47 (2019).

in these drills, which provide an opportunity for all parties to share information such as restoration priorities and the respective contact personnel for each stakeholder.

In addition, there needs to be more communication between communications companies and electric utilities prior to storm and other disaster events on issues such as identifying crucial facilities and infrastructure and methods of communicating the status of outages and restoration efforts. For example, electric utilities need to know which data centers and other facilities are critical to the communications companies, as well as the level of resiliency of these data centers and facilities and the communications companies' priorities for restoration. Southern emphasized that these data centers and facilities should have sufficient backup power and noted that there is often a disconnect between what communications companies will identify as "critical" and what is being done by the communications companies to protect or harden these facilities. Southern also pointed out that, during and after a storm event, information on electric service outages and estimated time to restoration is readily available (Georgia Power, for example, makes this information publicly accessible on its website), and communications companies should leverage and incorporate this information resource into their own service restoration planning.

During a storm or disaster event, communication between all parties should take place in the designated Emergency Operation Centers ("EOC"). The EOC should serve as the primary point of coordination because that is where information on priorities can be exchanged and established between communications companies, electric utilities, state and local officials, and other stakeholders. The communications sector needs to be more engaged in the local EOCs.

Finally, Southern explained that better communication and coordination needs to take place between communications companies and those state and local agencies and organizations responsible for debris removal, which is the first phase of recovery from a storm or other disaster. The vast majority of fiber cuts that occur during the recovery phase are caused by debris removal crews who are generally unaware of the nature of the fiber that they encounter during clearing and cleanup operations. Southern observed that fiber cuts can also be an issue where underground fiber is routed close to a utility pole that must be replaced, but the utility is not made aware of the presence or location of that fiber. In order to mitigate this issue, fiber providers should provide locators to utility crews so that they can locate fiber where restoration work is occurring and thus take appropriate steps to avoid any damage to the fiber.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ David D. Rines
David D. Rines
Counsel to Southern Company

cc: Jeffery Goldthorp
Nicole McGinnis
Michael Connelly
Renee Roland
Beau Finley